

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
	: Chapter 15
DAEBO INTERNATIONAL SHIPPING	:
CO. LTD.,	:
	: Case No. 15-10616 (MEW)
	:
Debtor in a	:
Foreign Proceeding.	:
	: EXPEDITED MOTION FOR
	: PARTIAL RELIEF FROM
	: PROVISIONAL STAY
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1. Jaldhi Overseas Pte. Ltd. ("**Jaldhi**") respectfully submits this expedited motion for relief from the provisional stay granted to petitioner Chang-Jung Kim ("**Petitioner**") in connection with Petitioner's application for recognition of the Daebo International Shipping Co., Ltd. ("**Daebo**" or the "**Foreign Debtor**") Korean Bankruptcy proceeding ("**Korean Proceeding**") pursuant to 11 U.S.C. 1501 *et seq.* ("**Chapter 15**") so that Jaldhi may enforce its contractual liens on freight payments ("**Freight**") owed to Daebo by certain United States cargo receivers ("**Cargo Receivers**").¹

2. In support of the motion, Jaldhi submits the accompanying memorandum of law, and the declaration of C.J. Kim, dated April 23, 2015 ("**Kim Declaration**"), and the Declaration of Vira Chand Bothra, dated April 23, 2015 ("**Bothra Declaration**"), which contain statements of the relevant facts and Korean law.

3. As discussed with this Court, Daebo will provide confirmation to both Jaldhi and this Court on Monday as to whether this motion is opposed.


¹ The precise entities that will be receiving the Cargo and are otherwise obligated to pay Freight to Daebo is currently unclear to Jaldhi. A complete list of the "notify parties" with respect to the Cargo currently being carried the Vessel is attached hereto as Exhibit A to the Bothra Declaration.

4. Wherefore, Jaldhi respectfully request that this Court enter and order granting relief from and modifying the provisional and any final stay so as to permit Jaldhi to enforce its Freight liens in the United states (ii) granting them such other and further relief to which they may be entitled.

Dated: New York, New York
April 24, 2015

Respectfully Submitted,

HOLLAND & KNIGHT LLP
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